

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	JUDGE DONALD C. NUGENT
Plaintiff,)	
)	
v.)	CASE NO. 1:24-CR-00289
)	
MATTHEW M. MOTIL,)	
)	
Defendant.)	<u>UNOPPOSED MOTION FOR</u>
)	<u>PERMISSION TO TRAVEL</u>

Now comes the Defendant, Matthew Motil (“Mr. Motil”), by and through counsel, and respectfully moves this Court for an Order granting Defendant permission to travel temporarily to Santa Maria, California, to assist his parents while his mother recovers from a broken arm. He requests permission to travel for approximately two weeks in February 2025.¹

Several weeks ago, Mr. Motil’s mother broke her arm. His father has been her primary caretaker during her recovery. While Mr. Motil’s father continues to work full-time, he has been responsible for transporting his wife to all her follow-up appointments and physical therapy appointments, which are several times per week. This process has naturally been very tough for his parents, given their age and the lack of familial support nearby. Mr. Motil would like to visit his parents to help take care of his mother and temporarily lighten the load for his father.

¹ Upon the granting of this order, Mr. Motil will provide his supervising officer and the Court with specific travel dates once his flights have been purchased.

Defense counsel has conferred with the Government regarding this request. The Government has confirmed it is not opposed to Mr. Motil's request. Moreover, Mr. Motil's pre-trial supervisor has confirmed that he has been in full compliance with the conditions of his release. Thus, Mr. Motil respectfully requests this motion be granted.

Respectfully submitted,

/s/ Paul M. Flannery

Paul M. Flannery (OH: 0091480)

Olivia S. Gipson (OH: 0101178)

Flannery | Georgalis, LLC

1375 E. 9th St., 30th Floor

Cleveland, OH 44114

(216) 367-2120

paul@flannerygeorgalis.com

ogipson@flannerygeorgalis.com

Attorneys for Defendant Matthew Motil

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2025, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Paul M. Flannery

Paul M. Flannery (OH: 0091480)

Attorney for Defendant Matthew Motil